

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

PETER LORA, et al

V.

DEAN BOLAND

1:07 CV 2787

JUDGE DAN AARON POLSTER

RESPONSES TO PLAINTIFFS' INITIAL  
DISCOVERY

**Defendant** provides the following responses to Plaintiffs' Initial Discovery Requests.

Plaintiffs' Definitions and Instructions contain items that are either in error or are vague necessarily preventing responses to some items as indicated. In addition, many answers require information from memory of events and items more than three years old. In such instances, my answers are made based upon my memory or lack of memory of those items or events.

Interrogatory No. 1

My computers and other backup media containing all data relevant to this interrogatory and others was seized by the federal government on June 24, 2005 and is not in my possession. I have no independent memory of the data relevant to this interrogatory.

Interrogatory No. 2

I have not viewed and have shredded the pages purporting to contain images of the alleged minor plaintiffs in this matter. A response to this interrogatory is not possible for lack of information.

Interrogatory No. 3

My computers and other backup media containing all data relevant to this interrogatory was seized by the federal government on June 24, 2005 and is not in my possession. I presume the question

meant to ask what **persons** hired me as an expert witness as I was not hired by any lawyers as an expert witness, only their clients. The following list is from my memory only.

1. The State of Ohio
2. Phil Shreck (deceased)

Interrogatory No. 4

1. None at this time.

Additional names will be provided as facts develop in discovery.

Interrogatory No. 5

Cannot respond for lack of information.

Interrogatory No. 6

Cannot respond for lack of information.

Interrogatory No. 7

Objection. Irrelevant and Offensive.

Interrogatory No. 8

Cannot respond for lack of information.

Interrogatory No. 9

Cannot respond for lack of information.

Interrogatory No. 10

Insufficient definitions provided to answer this question.

Interrogatory No. 11

See response to Interrogatory No. 10.

Interrogatory No. 12

Insufficient definitions provided to answer this question. Calls for legal advice to opposing counsel.

Interrogatory 13

I do not concede the claim in this interrogatory is correct. I lack the capacity to know what other people are aware of at any given time in the past.

Interrogatory 14

See response to Interrogatory 13.

Interrogatory 15

I do not concede the claim in this interrogatory is correct. I lack the capacity to know what other people may have at any time possessed.

Interrogatory 16

1. Boland v. Difiori's - contract breach with contractor. Default judgment obtained and released in bankruptcy of the Defendant. Lakewood Municipal Court.

Interrogatory 17

Overbroad and Irrelevant.

Interrogatory 18

**I have never** participated in a seminar regarding "violations of pornography law." The remainder of this interrogatory I cannot respond to for lack of information.

Interrogatory 19

I lack the capacity to know what other people know about the allegations in the complaint.

Interrogatory 20

None.

Request for Production No. 1

The statement has already been provided.

Request for Production No.2

No such article was published.

Request for Production No. 3

No such certification exists.

Request for Production No. 4

**At this time, I** do not know which documents I will use at any future depositions.

Request for Production No. 5

Irrelevant and overbroad. To the extent this information is discoverable, I recently had a data failure with my home computer, as such, please refer this request to Pre-trial services.

Request for Production No. 6

None at this time relevant to experts. Any material reviewed by counsel is privileged.

Request for Production No. 7

Overbroad. Irrelevant to the claim or defense of any party.

Request for Admission No. 1

**Objection.** Irrelevant to the claim or defense of any party.

Request for Admission No. 2

Cannot admit or deny for lack of information.

Request for Admission No. 3

Cannot admit or deny for lack of information.

Request for Admission No. 4

Cannot admit or deny for lack of information.

Request for Admission No. 5

Cannot admit or deny for lack of information.

Request for Admission No. 6

Cannot admit or deny as question is vague.

Request for Admission No. 7

Cannot admit or deny as question is vague.

/s/ Dean Boland  
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CERTIFICATE OF SERVICE

A copy of the foregoing has been served on the following persons by email and regular U.S.

**Mail this 29th** day of April, 2008.

/s/ Dean Boland  
Dean Boland (0065693)